

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Tommy Owens

Case: 2:22-mj-30044

Assigned To : Unassigned

Assign. Date : 1/28/2022

CMP: USA v OWENS (MAW)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2, 2021 in the county of Jackson in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922 (g)(1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:


See attached affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

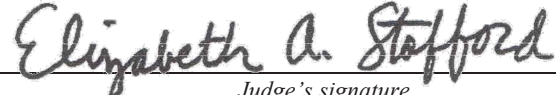
Date: January 28, 2022

City and state: Detroit, Michigan

  
Complainant's signature

Matthew Rummel, Special Agent, ATF

Printed name and title

  
Judge's signature

Hon. Elizabeth A. Stafford, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR  
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Matthew Rummel, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND BACKGROUND**

1. I am a Special Agent with the U.S. Department of Justice - Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so since September 2014. I am currently assigned to Detroit Field Division. Prior to joining the ATF, I was employed, for approximately eight years, as a State Parole Agent with the Michigan Department of Corrections. During that time, for approximately four years, I was assigned to a multi-jurisdictional task force made up of federal, state, and local law enforcement agencies. I have participated in numerous investigations involving firearms, narcotics trafficking by armed individuals, fraud, robberies, assaults, homicides, and criminal street gangs. I have been the affiant on numerous federal search warrants and federal criminal complaints. I have a Bachelor's degree in criminal justice, and I am a graduate of the Federal Law Enforcement Training Center Criminal Investigator School and ATF's Special Agent Basic Training school.

2. I submit this affidavit in support of a criminal complaint charging that, on or about December 2, 2021, within the Eastern District of Michigan, Tommy

OWENS, DOB XX/XX/1991, an individual having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess ammunition that had previously traveled in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

3. This affidavit is based upon information I have gained from my investigation, my training and experience, and from information provided by law enforcement officers and others who have personal knowledge of the events and circumstances described herein. The information set forth in this affidavit is in support of a complaint and arrest warrant and is for the limited purpose of establishing probable cause; this affidavit, therefore, does not include all the information collected during this investigation and about which I am aware.

### **PROBABLE CAUSE**

4. On or about December 2, 2021, Michigan State Police (MSP) Trooper Escott was working in Jackson, Michigan, with the Jackson Narcotics Enforcement Team. Trooper Escott observed that the vehicle had a defective muffler and executed a traffic stop. Four people were observed in the vehicle. The driver, TOMMY OWENS, was found to have a felony warrant out of Blackman Township and was placed under arrest.

5. During a search of the vehicle, a 9mm pistol was located below the front passenger seat, loaded with two live rounds of 9mm ammunition.

6. OWENS was searched incident to arrest. In his left front pocket, Trooper Escott recovered a live round of 9mm ammunition and plastic baggies. The ammunition was from Freedom Munitions.

7. I have consulted with ATF Special Agent (S/A) Michael Parsons, an interstate firearms nexus authority. S/A Parsons has determined based on the description and picture of the ammunition that the ammunition found in OWENS's left front pocket was manufactured outside the state of Michigan and has therefore previously traveled in interstate commerce.

8. I have queried the computerized criminal history for Tommy OWENS, which revealed he had previously been convicted of a felony and served two terms in prison. Specifically, in 2010, he pled guilty and was convicted in the 4th Circuit Court of Michigan (Jackson County) of Larceny from a Person, in violation of Mich. Comp. Laws § 750.357, which is punishable by imprisonment for a term exceeding one year. OWENS was sentenced on October 21, 2010 to 24 months to 10 years in prison for the offense and was paroled on May 1, 2013.

9. In 2014, he was convicted in the 1st Circuit Court of Michigan (Hillsdale County) of Assault, Resisting, Obstructing the Police, in violation of Mich. Comp. Laws § 750.81D1, which is also punishable by imprisonment for a term exceeding one year. OWENS was sentenced to 16 months to 24 months in

prison on November 17, 2014. He is therefore prohibited by law from possessing ammunition that has traveled in interstate or foreign commerce.

10. I am aware that the Michigan Court Rules (which are used in the state court system in Michigan) require a court to advise a criminal defendant of the maximum possible prison sentence for an offense before accepting a plea of guilty or nolo contendere to the charge. Therefore, as a result of OWENS aforementioned guilty plea, as well as the fact that he has served multiple prior prison terms in excess of one year, there is probable cause to believe that he knew that he was a felon and had been previously convicted of a crime punishable by imprisonment for a term exceeding one year when, on December 2, 2021, he possessed the ammunition.

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11. Based on the above, I respectfully submit there is probable cause to find that, in or around December 2, 2021, within the Eastern District of Michigan, Tommy OWENS, after having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess ammunition that had previously traveled in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

Respectfully submitted,



Matthew Rummel, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Sworn to before me on this  
28th day of January 2022.



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ELIZABETH A. STAFFORD  
UNITED STATES MAGISTRATE JUDGE